

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
24-CR-89 (JWB/LIB)

UNITED STATES OF AMERICA,)
)
Plaintiff,) **DEFENDANT'S SECOND**
)
v.) **MOTION TO EXCLUDE TIME**
)
John David Degelau,) **UNDER THE SPEEDY TRIAL**
)
)
Defendant.) **ACT**

The defendant, John David Degelau, having been advised by his lawyers, Paul Engh and Garrett Gondik, and in accordance with 18 U.S.C. 3161 (h)(8)(A) and (B)(iv), moves the Court for an exclusion of time under the Speedy Trial Act. Our grounds are these.

1. The case is complex, and the discovery is voluminous. The prison time stakes involved in this litigation remain significant. Motions are due June 25, 2024.
2. Mr. Degelau is currently undergoing a forensic evaluation. Initial interviews have been accomplished, but there has been a delay in securing all the medical records needed for a complete review of his medical history. The records were timely requested but have not yet been received. Mr. Degelau's records are extensive.

3. Additional time is thus needed to complete the forensic evaluation and consider its implications in his defense of the charges.

4. Mr. Degelau, by his attached Second Statement of Reasons, consents to an additional delay of up to two months, and he does so knowingly and willingly and voluntarily.

5. He has been released, and is without incident.

Dated: June 24, 2024

Respectfully submitted,

/s/ Paul Engh

PAUL ENGH - Lic. 134685
150 South Fifth Street, Suite 2860
Minneapolis, MN 55402
(612) 252-1100
engh4@aol.com

Garrett Gondik
1215 Belknap Street
Superior, Wisconsin 54880

Counsel for Mr. Degelau